

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2008-196-E**

IN THE MATTER OF:

South Carolina Electric & Gas Company)	
Combined Application for Certificate)	CONSEQUENCES.
Of Environmental Compatibility and)	MOTION by JOSEPH WOJCICKI
Public Convenience and Necessity and)	-INTERVENOR <i>PER SE</i>
For a Base Load Review Order)	
)	

CONSEQUENCES.

Please do make legal, formal or informal notices about following noted facts:

1. Notice is hereby given that Joseph Wojcicki, on behalf of himself as Per Se (Intervenor) in the above named case, hereby did petition the Commission for rehearing or reconsideration of Order No 2009-104(A) approving the Combined Application of SCE&G for the Construction and Operation of a Nuclear Facility in Jenkinsville, SC. The Order denies my Motion to Change the Location of the two New Reactors Planned by Applicant; Motion was dated November 10, 2009. Please, accept the way in the rest of this Motion text where pronouns *I*, and *my* are used instead of "*Wojcicki*."
2. SCE&G Company (Applicant) never wrote any serious rebuttals to the calculations and their results supporting Atlantic Ocean Location (AOL) even for these so important aspects as better electric energy distribution and saving over 40 millions gallons of water per day from Broad River in SC. The Applicant's Response to Intervenor Petitions... dated March 19, 2009, again has no answer for any of above my suggestions. They have economical, social and environmental aspects that show the effectiveness of AOL. It is such strange opposition in this Applicant's document, to my very friendly offered help, in the way to save the project for SC, with keeping SC interest in our mind.
3. The Applicant's selection of the Jenkinsville site was done in 2005. It is completely wrong in 2008 and 2009 when we know SC plans and water situation in the nearest future. Consequences: the stubborn SCE&G position to locate new reactors in Jenkinsville is illogical and would cost unnecessary billions of dollars the State of SC and its residents. Supporting arguments: My calculations that were never opposed by Applicant nor ORS and well-known drought hazards in last years, especially for nuclear reactors in Southeast (SE) region.
4. In my troubleshooting of Application, I could not find proper analytical, engineering documentation in such important, basic, and should be the largest, first chapter/section/part of their "paper works". The part that could be named: The

Electricity Generating and Distributing Southeast Network Topography. Consequences: Weak hearing, refused answers for questions, in cross-examination, because sometime mistakes/errors could not be addressed to the proper page number because those problems were simply omitted. PSC could not find on the map that transmission lines are shorter from JOT to Charleston than from Jenkinsville to JOT or other AOL, instead Commission accepted Mr. Young bold (and misleading) statement that AOL will require more transmission lines. In fact, AOL will eliminate necessity to add additional lines from Jenkinsville to Charleston.

5. The Applicant and ORS have ignored plans for Jasper Ocean Terminal (JOT). It is the insult to SC and GA Governors' signatures put on documents in March 2007 and ignorance of our international trade interests..
6. In my first Request for Additional Information (discovery stage - September 22, 2008), I did specifically suggest scientific and professional answers for listed cooling water problems. The Applicant did fail to answer in the professional way. Then I did another research, by myself, using also mostly Westinghouse and some SCE&G available materials to do calculate enormous volume of the water to be evaporated by reactors in the future. The results support my concept of AOL. Consequences: Wrong PSC decision accepting Jenkinsville location.
7. According to information from the SC press, SC Attorney General has opened, in US Supreme Court lawsuit: "SC vs. NC (Catawba River water case)" in 2007. There was given a number of 10 millions gallons of water per day (sought relief?). Compare to additional 40 millions gal/day for new Applicant's reactors. An ignorance (and seems to be insult to SC) these numbers could create bad consequences for the future of this case. If my information is correct, Mr. McMaster asks State for \$2.2 millions to continue this case process. Compare this number to \$10 millions spent on pre-works in Jenkinsville which, by the way, were opposed by intervenors in 2008.
8. Note that opportunity to save tens of millions of gallons of water for Midland and Columbia, SC and \$\$ billions because of wrong network topology is never mentioned in Applicant documents, ORS documents (that had to be an engineering verification of Application) and consequently in the PSC Order.
9. The only effective solution correcting the wrong location is found in My Motion and supporting it calculations. Doing troubleshooting of Applicants documents, comparing them to real world electric power generating technologies including nuclear I pointed on other very primitive errors in the Application but it was also ignored and we have proof of this in the Order (March 2, 2009) where Second Revised Exhibit N (31 pages) still have non- professionally and slovenly typed power and energy unit notations.

10. Please note that my suggestions are supported by technical calculations and analysis and has no arguments to oppose. They also represent the interest of SC and SE region of the USA. Supporting arguments: common sense.
11. In the national and specifically the State financial situation, all better, also money - saving solutions must be accepted. The Application without product (electricity) and distribution services (grid, network) full prudent and professionally presented documentations must be rejected or sent for reworks. Consequences of leaving it as is will bring global embarrassment to authors and harm SC.
12. It is advisable to investigate if Georgia and SC governors, as well as their Attorney Generals were informed about my Atlantic Ocean Location concept for Applicants' reactors. Maybe also, Duke Power as another Electric Company being interested in water to cool their reactors and share electricity market on SE should be informed. Arguments: Transparence in the process.

AOL is the location which has solid scientific calculations and analysis. And nobody rebutted it since November 10, 2008.

WHEREFORE for the foregoing reasons, I, Joseph "Joe" Wojcicki – intervenor in this case hereby urges the Commission to change the Order accepting Motion dated November 10, 2008, to request SCE&G to do a rework of the Application to new location, as well as do make all notices that might be used in a next stage of the Application review.

Respectfully submitted:

Joseph Wojcicki

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March 22, 2009

CERTIFICATE OF SERVICE

The copy of this Notice of Appeal is sent to:

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Or by Email Service to the parties named below:

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Columbia, SC

March 23, 2009